



40 Broad Street, 7th Floor
New York, New York 10004
Telephone: (212) 943-9080
Facsimile: (212) 943-9082

John M. Harras
Partner
jharras@vandallp.com

June 29, 2021

VIA ELECTRONIC CASE FILING

Hon. Marcia M. Henry, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Trs. of the Local 7 Tile Indus. Welfare Fund, et al. v. Artisan
Stoneworks, Corp.; Civil Action No.: 20 CV 4679 (RPK) (JO)**

Dear Magistrate Judge Henry:

This firm represent Plaintiffs in the above-referenced matter. Plaintiffs write jointly with Defendant to respectfully request that the Court extend the parties' time to complete discovery by 30 days, from August 4, 2021 until September 3, 2021.

After extensive settlement discussions were unsuccessful, Plaintiffs, on April 30, 2021, served Defendant with written discovery demands. On May 24, 2021, Defendant requested a 30-day extension of time to respond. Plaintiffs consented. On May 28, 2021, Defendant served Plaintiffs with written discovery demands and deposition notices. On June 15, 2021, Plaintiffs served a Rule 30(b)(6) notice on Defendant and subpoenas *duces tecum* on four non-parties. On June 25, 2021, Plaintiffs served subpoenas *ad testificandum* on those non-parties. To accommodate Plaintiffs' review of the documents requested of Defendant and of non-parties by Plaintiffs and to accommodate calendar conflicts among non-parties, the parties, and counsel, the parties require additional time to complete discovery.

Accordingly, the parties respectfully request that the Court grant them a 30-day extension of time to complete discovery. This request is the first such request. All parties consent.

The parties thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/
John M. Harras

cc: Counsel of Record (via ECF)